

File

Jump, Christine

From: Michael Stephenson <mstephenson@cameron-cole.com>
Sent: Wednesday, July 23, 2014 5:08 PM
To: Jump, Christine; SMITH, MARTIN L
Cc: Akhter Hossain
Subject: RE: Reporting Limits and Detection Limits table
Attachments: 1808-Soil-Metals.pdf

Hi Chris,

I have turned my attention back to rounding out the remainder of the IRM work plan comments, and last we spoke, I had promised you a figure regarding our discussion on comment #4 below.

The figure we discussed is attached, and it shows the following:

1. Locations of all borings where metals were sampled
2. Locations of all metal IAO exceedances

66?

There are only three metals results that exceed IAOs that are not within the proposed limits of our excavation (B-67, B-16 and BC-4). There have been numerous samples collected for metals across the site that document that they are not present at concentrations exceeding IAOs across most of the Site.

For this reason, I propose the following. We will collect confirmation samples for metals at the same frequency as the VOC confirmation samples in the following areas.

1. Northeastern corner (Lead and chromium)
2. Processing Area (chromium)

Confirmation samples for metals in all other areas will be collected at a rate of 10% of the VOC samples.

Any residual metals concentrations, from either the existing three samples not captured by the ongoing IRM, and any confirmation samples that are not further excavated during the IRM will be addressed in the CMS/risk assessment.

If you are agreeable to this I will include this plan in the response to comment letter. If not, please give me a call so we can find common ground and get this submittal squared away at long last.

Thanks,

Mike

From: Jump, Christine [mailto:Jump.Chris@epa.gov]
Sent: Monday, July 07, 2014 1:12 PM
To: Michael Stephenson; SMITH, MARTIN L
Cc: Akhter Hossain
Subject: Reporting Limits and Detection Limits table

Mike-

I have a couple of concerns about the table referenced above.



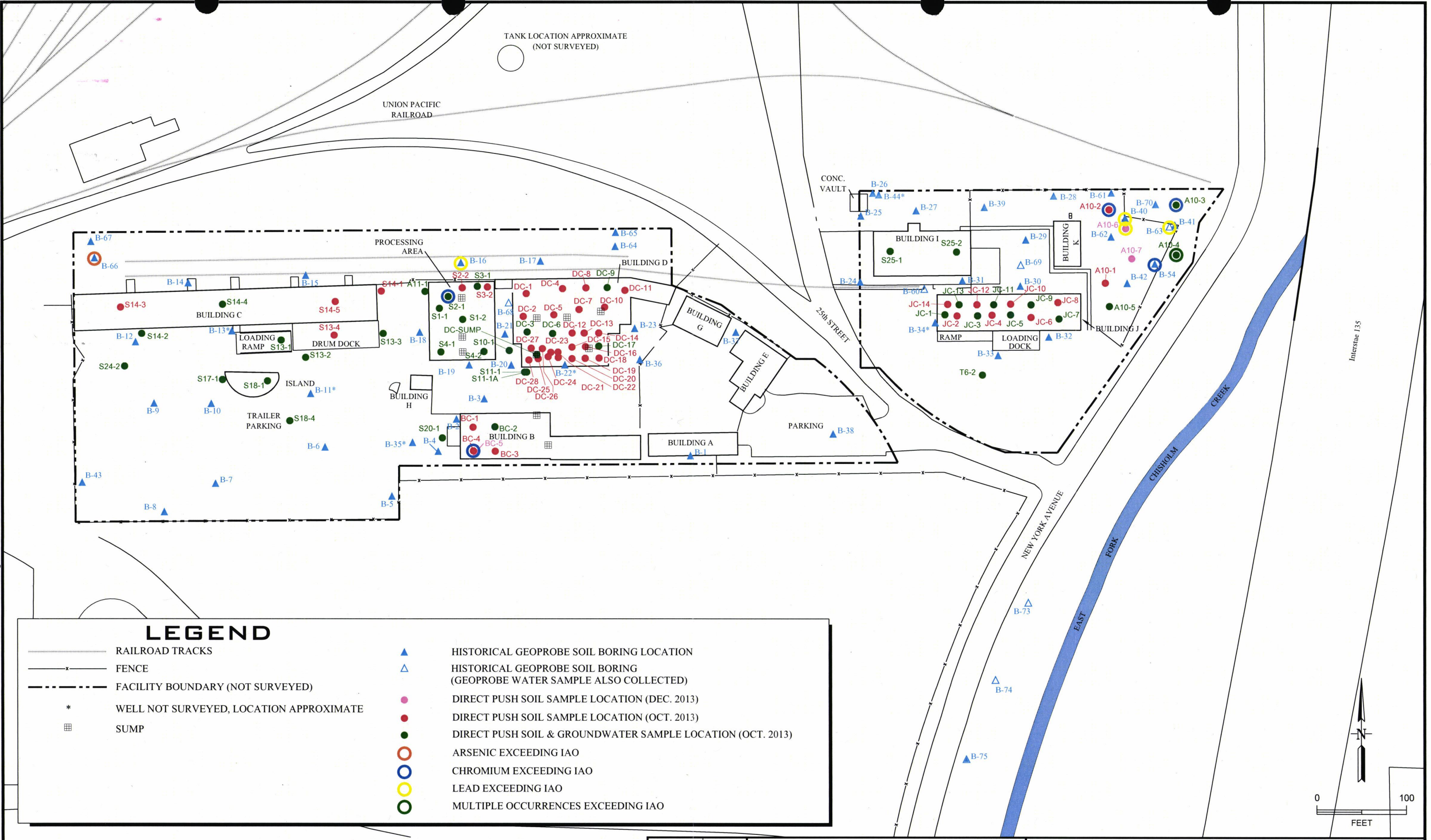
- 1) In the notes, RL is defined as the Reporting Limit. In a previous conversation, you told me that the RL for this project would also be the Quantitation Limit. (QL). This needs to be stated or included in the definition of RL, since RLs may vary depending on the Lab or at a clients' request.
- 2) 1,4-Dioxane does not appear to be included on this table, and must be added.
- 3) There are a lot of NAs listed as the IAO on this table. NA is not defined in the table and EPA does not believe NA is an appropriate Interim Action Objective. EPA realizes that many of the compounds with the NAs were not detected during the RFI phases, however, detection levels and required analyses varied between phases and that is not a guarantee that those compounds will not be detected during the closure sampling. It is EPA's understanding that the compounds with NAs were not listed in the KDHR RSK manual; however, many of those chemicals are listed in the EPA RSL tables. Please propose an IAO for these compounds or propose a method of determining an IAO.
- 4) The table states, "Other compounds to be analyzed at a frequency of 10% of the total VOC analyses, where specified." Since elevated metals have been detected in several locations across the site, EPA will require that metals be analyzed at the same frequency as VOCs.

Please call me if you would like to discuss these comments before submitting a response.

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SOIL METALS SAMPLING LOCATIONS and IAO EXCEEDANCES CLEAN HARBORS KANSAS, LLC		
SCALE:	AS SHOWN	PROJECT: 1808